

Executor of the Estate of Alan Beer, Harry Leonard Beer, Anna Beer, Phyllis Maisel, Estelle Carroll, Sarri Anne Singer, Judith Singer, Eric M. Singer, Robert Singer, Julie Averbach for the Estate of Steven Averbach, Julie Averbach, Tamir Averbach, Devir Averbach, Sean Averbach, A.A., a minor, Maida Averbach for the Estate of David Averbach, Maida Averbach, Michael Averbach, Eileen Sapadin, Daniel Rozenstein, Julia Rozenstein Schon, Alexander Rozenstein, Esther Rozenstein, Jacob Steinmetz, Deborah Steinmetz, Jacob Steinmetz and Deborah Steinmetz for the Estate of Amichai Steinmetz, Nava Steinmetz, Orit Mayerson, Natanel Steinmetz, Robert L. Coulter, Sr. for the Estate of Janis Ruth Coulter, Dianne Coulter Miller, Robert L. Coulter, Sr., Robert L. Coulter, Jr., Larry Carter for the Estate of Diane Leslie Carter, Larry Carter, Shaun Choffel, Richard Blutstein and Katherine Baker for the Estate of Benjamin Blutstein, Richard Blutstein, Katherine Baker, Rebekah Blutstein, Nevenka Gritz for the Estate of David Gritz, Nevenka Gritz, Nevenka Gritz for the Estate of Norman Gritz, Jacqueline Chambers as the Administrator for the Estate of Esther Bablar, Jacqueline Chambers, Levana Cohen, Eli Cohen, Sarah Elyakim, Yehuda Agababa, Menache Agababa, Yehezkel Agababa, Greta Geler, Ilana Eropa Dorfman, Refael Kitsis and Tova Guttman as the Administrators for the Estate of Hannah Rogen, Akiva Anachovich, Joshua Faudem, Zohar Fater, Bruce Mazer, Orly Rom, Richard Coffey, Gal Ganzman, Judith Buchman-Ziv, Ora Cohen, Mirav Cohen, Daniel Cohen, O.C., a minor, S.C., a minor, E.N.C., a minor, Faiga Zvia Lieberman, Einat Noked for the Estate of Eyal Noked, Einat Noked, A.N., Avishag Noked, Baruch Zuri Noked, Binyamin Elkana Noked, Neta Nechama Cohen, T.N., a minor, Karen Goldberg, Chana Weiss, Esther Goldberg, Yitzhak Goldberg, Shoshana Goldberg, Eliczer Goldberg, Y.M.G., a minor, T.Y.G., a minor, Nilly Choman, Temima Spetner, Jason Kirschenbaum, Isabelle Kirschenbaum, Isabelle Kirschenbaum for the Estate of Martin Kirschenbaum, Joshua Kirschenbaum, Shoshana Burgett,

David Kirschenbaum, Danielle Teitelbaum, Netanel Miller, Chaya Miller, Arie Miller, Altea Steinherz, Jonathan Steinherz, Baruch Yehuda Ziv Brill, Chaya Beili, and Gila Aluf (collectively, “Weiss Plaintiffs”), filed their sixth amended complaint (“Weiss Action”) against National Westminster Bank PLC (“Defendant”).

WHEREAS, Plaintiffs’ counsel in the Weiss Action have also been retained by Aharon Miller, Shani Miller, Adiya Miller, Peter Steinherz, Laurel Steinherz, Joseph Ginzberg, Temima Steinherz, and Joseph Cohen (“Additional Weiss Plaintiffs”).

WHEREAS, on June 17, 2016, The Estate of David Applebaum, The Estate of Naava Applebaum, Debra Applebaum, The Estate of Jacqueline Applebaum, Natan Applebaum, The Estate of Naava Applebaum, Shira Applebaum, Yitzchak Applebaum, Shayna Applebaum, Tovi Belle Applebaum, Geela Applebaum Gordon, Chaya Tziporah Cohen, Philip Litle, The Estate of Abigail Litle, Elishua Litle, Hannah Litle, Heidi Litle, Josiah Litle, Noah Litle, Ari Horovitz, Batsheva Horovitz Sadan, David Horovitz, The Estate of Debra Ruth Horovitz, The Estate of Eli Natan Horovitz, The Estate of Leah Horovitz, The Estate of Moshe Horovitz, Nechama Horovitz, Shulamite Horovitz, Tova Horovitz Naiman, Tvi Horovitz, Uri Horovitz, The Estate of Bernice Wolf, The Estate of Bryan Wolf, Stanley Wolf, Fran Strauss Baxter, William J. Baxter, Ariela Freirmark, Menachem Freirmark, Hadassah Freirmark, Phyllis Pam, Rivka Reena Pam, Shoshana Tita, Ezra Tita, Ephraim Tita, The Estate of Bertin Tita, Rachel Potolski, Ovadia Topporowitch, Yisrael Topporowitch, Yitzchak Topporowitch, Miriam Ehrenfeld, Joseph Rose, Leibel Reinitz, Malvia Reinitz, Margali Reinitz, Mendy Reinitz, Miriam Reinitz, Rivka Reinitz, Samuel Reinitz, Shmuel Reinitz, Yakov Reinitz, The Estate of Mordechai Reinitz, The Estate of Yissocher Dov Reinitz, Yitzchok Reinitz, Raizel Shimon, Leah Tauber, Helen Weider, Avrohom D. Richter, Breina Richter, Miriam Leah Richter, Moshe Richter, Nechama Richter, Sara Malka

Richter, Shlomo Chaim Richter, Tranne Richter, Yakov Yosef Richter, Yechiel Richter, Yehudis Richter, Yisroel Richter, Yitzchok Richter, Perl Brailofsky, Malky Breuer, Ester Buxbaum, Gittel Cohen, Chaya Freisel, Rachel Rosner, Elizabeth Schwartz, Jacob Schwartz, Max Schwartz, Michael Schwartz, Phillip Schwartz, Abraham Zarkowsky, Aron Zarkowsky, Bshava Zarkowsky Richter, the Estate of Eli Zarkowsky, Ezriel Zarkowsky, Gittel Zarkowsky, the Estate of Goldie Zarkowsky, Joseph Zarkowsky, Mendel Zarkowsky, Miriam Zarkowsky, Shrage Zarkowsky, Trany Zarkowsky, Yehuda Zarkowsky, Erik Schechter, Shlomo Tratner, The Estate of Tiferet Tratner, Averham Grossman, Devorah Chechanow Leifer, Joseph Leifer, Bracha Milstein, Shifra Miller, Chaya Rosenberg, Abraham Waxler, Arthur Waxler, Baruch Waxler, Chana Waxler, Dina Waxler, Ezekiel Waxler, Gedalia Waxler, Haggi Waxler, Nachum Waxler, Obadiah Waxler, Yaakov Waxler, Yoel Waxler, Zacharia Waxler, Nethaniel Bluth, Moshe Naimi, Faye Chana Benjaminson, The Estate of Moshe Gottlieb, Seymour Gottlieb, and Sheila Gottlieb (collectively, "Applebaum Plaintiffs"), filed their amended complaint ("Applebaum Action") against National Westminster Bank PLC ("Defendant").

WHEREAS, Plaintiffs' counsel in the Applebaum Action have also been retained by Ephriam Bluth, individually and as the Legal Representative of Shoshana Bluth, Tsipora Batya Bluth Reicher, Isaac Menachem Bluth, Yigal Amichai Bluth, Aryeh Yehuda Bluth, Chanina Samuel Bluth, Abraham Aharon Bluth, Joseph Shimshon Bluth, Nathan Pam, Raziell Pam, Neemah Pam Fisher, Baruch Tratner, Judith Tratner, Drora Wizner, Rivka Selzer, and Belka Gez ("Additional Applebaum Plaintiffs").

WHEREAS, the Weiss Plaintiffs, Applebaum Plaintiffs, Additional Weiss Plaintiffs, Additional Applebaum Plaintiffs, and Defendant seek to avoid the administrative burden of filing and responding to new actions that allege the same or similar facts as those alleged in the above-

captioned cases;

NOW, THEREFORE, it is stipulated and agreed as follows:

1. The Additional Weiss Plaintiffs may be added to the Weiss Action pursuant to Fed. R. Civ. P. 15(d) by filing a Supplemental Complaint within ten days of the entry of this order that sets forth the Additional Weiss Plaintiffs' names and nationalities and the dates, places and manners in which they were injured. None of the Additional Weiss Plaintiffs will be designated to testify at a liability trial.
2. The Additional Applebaum Plaintiffs may be added to the Applebaum Action pursuant to Fed. R. Civ. P. 15(d) by filing a Supplemental Complaint within ten days of the entry of this order that sets forth the Additional Applebaum Plaintiffs' names and nationalities and the dates, places and manners in which they were injured. None of the Additional Applebaum Plaintiffs will be designated to testify at a liability trial.
3. The Additional Applebaum Plaintiffs and Additional Weiss Plaintiffs need not reserve process upon Defendant, and may serve their Supplemental Complaints by serving a copy of that document upon Defendant's Counsel.
4. The terms of this Stipulation and Order shall not preclude Defendant from asserting any defense to the claims asserted by any Applebaum Plaintiff, Weiss Plaintiff, Additional Applebaum Plaintiff or Additional Weiss Plaintiff. Nor shall the terms of this Stipulation and Order preclude the Defendant from opposing any request by the Plaintiffs to add parties other than the Additional Applebaum Plaintiffs and Additional Weiss Plaintiffs to their respective actions through the filing of another Supplemental Complaint or otherwise.

5. The Defendant need not file a separate responsive pleading with respect to the individual claims asserted by the Additional Applebaum Plaintiffs or Additional Weiss Plaintiffs. If and when any Supplemental Complaint is filed pursuant to this Stipulation and Order, the Defendant will be deemed to have moved pursuant to its pending Motion for Summary Judgment, and for the reasons set forth therein, for dismissal of that Supplemental Complaint. Neither the Defendant, the Additional Applebaum Plaintiffs nor the Additional Weiss Plaintiffs shall file any additional briefing with respect to that motion.
6. Claims asserted by the Additional Applebaum Plaintiffs and Additional Weiss Plaintiffs pursuant to the terms of this Stipulation and Order will be considered to have been filed on the date the Stipulation and Order is filed by the parties with the Court and shall not relate back to the date the original complaint in this action was filed. However, Defendant acknowledges that, for limitations purposes, the Additional Applebaum Plaintiffs' and Additional Weiss Plaintiffs' claims will be treated as if filed on the date of the filing of this Stipulation and [Proposed] Order.

Dated: New York, New York
December 18, 2018

Respectfully submitted,

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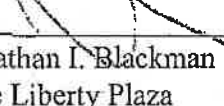
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SO ORDERED:

Dated: _____, 2018

Mag. Judge Robert M. Levy, U.S.D.C.